## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

BRENDA JOHNSON,

Plaintiff,

v. Case No.: 2:22-CV-00193

NORFOLK STATE UNIVERSITY,

Defendants.

## PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

COMES NOW, the Plaintiff, BRENDA JOHNSON, (hereinafter referred to as "Plaintiff" or "Ms. Johnson"), by the undersigned counsel, files this Opposition to the Defendant, NORFOLK STATE UNIVERSITY'S (hereinafter referred to as "Defendant") Motion for Summary Judgment and relies upon and incorporates the Brief in Support of this response as if fully set forth herein.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order denying the Defendant's Motion for Summary Judgement filed on August 11, 2023, and allowing the suit to move forward without delay.

Respectfully submitted,
Dated: September 15, 2023

Respectfully submitted,
By and through her counsel

/s/Alexander Taylor Alexander Taylor, Esq., VSB# 29292
Alex Taylor Law, PLC
1622 West Main Street
Richmond, VA 23220
Tel: 804-239-9232

Tel: 804-239-9232 Fax: 866-446-6167

alextaylor@alextaylorlaw.com

<u>/s/Charles Tucker, Jr.</u>
Charles Tucker, Jr., Esq., *Pro Hac Vice* 

MD Bar# 0808260001 The Cochran Firm - Hyattsville 8181 Professional Place Hyattsville, MD 20785 Email: charles@tuckerlawgroupllp.com

Telephone: 301-577-1175 Facsimile: 240-467-5787

## **Certificate of Service**

I hereby certify that on this 15th day of September, 2023, I electronically filed the foregoing Response to the Defendant's Motion for Summary Judgment using the CM/ECF System, which will send notification of such filing to all Parties:

Melissa Y. York Harman, Claytor, Corrigan, & Wellman P.O. Box 70280 Richmond, Virginia, 23255 myork@hccw.com

<u>/s/Alexander Taylor</u>

Alexander Taylor, Esq., VSB# 29292 Alex Taylor Law, PLC 1622 West Main Street Richmond, VA 23220 Tel: 804-239-9232

Fax: 866-446-6167

alextaylor@alextaylorlaw.com

<u>/s/Charles Tucker, Jr.</u>

Charles Tucker, Jr., Esq., Pro Hac Vice MD Bar# 0808260001 The Cochran Firm - Hyattsville 8181 Professional Place Hyattsville, MD 20785

Email: charles@tuckerlawgroupllp.com Telephone: 301-577-1175

Facsimile: 240-467-5787